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January 25, 2018

**Ex Parte**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**Re: *Promoting Telehealth in Rural America*, WC Docket No. 17-310**

Dear Ms. Dortch,

On January 23, Cathy Carpino and the undersigned of AT&T Services, Inc. met with the following Wireline Competition Bureau staff to discuss the Commission's pending Notice of Proposed Rulemaking in the above-captioned docket: Radhika Karmarkar, Regina Brown, Dana Bradford, Beth McCarthy, Preston Wise, Carol Pomponio (via phone), and Arielle Roth.

The purpose of the meeting was to discuss issues we have identified with the Telecom Program and potential reforms to address those deficiencies. The proposed reforms we discussed focused on increasing transparency in this program (e.g., making publicly available applicant's funding requests as is done today in the E-rate program) and targeting support to mileage-based services to address the reasonable comparability requirement of section 254(h)(1)(A). We also discussed extending E-rate "best practices" to the Rural Health Care Program, including E-rate gift rules, bid evaluation criteria, eliminating discounts for voice service, allowing beneficiaries to be reimbursed directly by USAC, and making more information publicly available through searchable databases on USAC's website. AT&T also recommended that reforms designed to eliminate the waste, fraud, and abuse should be adopted before there is any consideration given to increasing the cap on the program.

Please do not hesitate to contact me with any questions.

*/s/ Raquel Noriega*

Raquel Noriega

CC: Dana Bradford  
Regina Brown  
Radhika Karmarkar  
Beth McCarthy  
Carol Pomponio  
Arielle Roth  
Preston Wise